

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: New England Public Communications Council, Inc., Set #2

DATED: September 5, 2001

ITEM: NEPCC 2-1 Reference is made to Verizon's response to AG-VZ 2-2. Therein, Verizon indicates that "effective competition is present when barriers to entry are absent and there are no barriers to prevent...a company that already provides both cable and telephone service from offering a service throughout every exchange in Massachusetts." Is it therefore Verizon's position that a Verizon customer has a competitive choice, even though Verizon is the only available service provider, where there are no barriers to entry to other local exchange carriers choosing to provide the service?

REPLY: It was not Verizon MA's position and economics does not dictate that effective competition requires a customer to always have a competitive choice, only that no company be able to hold the market price above the competitive level. As discussed in Verizon MA's response to AG-VZ 2-2, it is Verizon MA's position that there are no substantive barriers to entry and that an entrant could thus supply output in the Massachusetts telecommunications market, were prices raised above the competitive level, within a one year period as set out in the Merger Guidelines of the U.S. Department of Justice.

VZ # 108

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: William E. Taylor
Title: Senior Vice President, NERA

REQUEST: New England Public Communications Council, Inc., Set #2

DATED: September 5, 2001

ITEM: NEPCC 2-2 Reference is made to Verizon's response to AG-VZ 2-19. Which, if any, CLECs among those listed on the Attachment thereto does Verizon contend provide "effective competition" to Verizon's Public Access Line ("PAL") or Public Access Smart-pay Line ("PASL") services in Massachusetts?

REPLY: Please see Verizon MA's response to NEPCC 2-1. Insofar as there are no substantive barriers to entry, any CLEC (on the list or not) could, in the event price exceeded the competitive level, enter and supply a competitive alternative to Verizon MA's PAL or PASL services in Massachusetts.

VZ # 109

**Verizon New England Inc.
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Respondent: William E. Taylor
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ITEM: NEPCC 2-3 How many (and which) of the CLECs identified as “effective competitors” in response to NEPCC Request No. 2-2 have tariffed a service that Verizon considers competitive to its PAL and PASL services in Massachusetts? Please provide relevant portions of the tariffs (or citations thereto) for any CLEC so identified.

REPLY: Please see Verizon MA’s response to NEPCC 2-2.

VZ # 110

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: New England Public Communications Council, Inc., Set #2

DATED: September 5, 2001

ITEM: NEPCC 2-4 Does Verizon offer a wholesale discount on resale of PAL and PASL services in Massachusetts? If so what is the discount for each service?

REPLY: Yes. Resellers who wish to use Verizon MA's operator services receive a discount of 24.99% against the retail PAL and PASL rates listed in the MA DTE 10 tariff. Resellers who do not use Verizon MA's operator services receive a 29.47% discount.

VZ # 111

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: New England Public Communications Council, Inc., Set #2

DATED: September 5, 2001

ITEM: NEPCC 2-5 Please identify any CLECs in Massachusetts that have entered into agreements with Verizon to resell Verizon's PAL and/or PASL service. Please provide copies of the relevant portions of any such agreements.

REPLY: CLECs wishing to resell PAL and PASL lines from Verizon MA may purchase them directly from the resale tariff (MA D.T.E. No. 14). See also NEPCC-VZ 2-6 (NET #113).

VZ # 112

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

Respondent: Robert Mudge
Title: President Verizon MA

REQUEST: New England Public Communications Council, Inc., Set #2

DATED: September 5, 2001

ITEM: NEPCC 2-6 Please provide any studies, reports, analyses, assessments reports or investigations conducted by Verizon or any agent or representative of Verizon that Verizon contends demonstrate the availability from CLECs or other service providers in Massachusetts of currently available services which are substitutes for or otherwise competitive with PAL or PASL.

REPLY: Verizon MA has not conducted studies that focus solely on competitive alternatives to PAL and PASL services.

Verizon MA does have a Resale Ranking Report that identifies resellers of PAL and PASL service in Massachusetts. The data contained in the Resale Ranking Report are the confidential and proprietary information of the CLEC that may not be disclosed by Verizon MA without the CLECs' authorization. In light of the Hearing Officer's discovery ruling of September 14, 2001, the information is being provided to the Department and to those parties that execute a mutually acceptable protective agreement.

Please see the attached Resale Ranking Report – July 2001.